

resources.⁶⁵ With characteristic overstatement, CURE ignores several workable enforcement mechanisms. First, the Commission could require inmate services providers to make rate quotations available to recipients of inmate collect calls, much as it required OSPs to make rates available on request in the 1989 TRAC Order.⁶⁶ By ensuring mandatory, advance notice of rates—either in real-time, as Gateway’s CPE technology permits, or through prior written disclosures—the Commission would permit informed decisions on acceptance of inmate collect calls and provide a solid record basis for subsequent rate enforcement, if necessary. Second, the Commission could adopt a variant of the California regulatory model, where the LECs are prohibited from billing and collecting charges for inmate and other payphone calls that exceed a CPUC-approved rate level,⁶⁷ thus creating a self-executing incentive for inmate providers to stay within any rate benchmark.

In the final analysis, however, CURE’s complaints about the difficulties of rate enforcement ring hollow, since it has not once attempted to enforce the Act’s requirement for just and reasonable rates against any inmate service provider, and offers no evidence at all that rate abuses in the inmate services market are serious or widespread. If the burden of enforcing a rate benchmark falls on CURE, its members and similarly situated groups, that is as it should be, because it is their burden to establish the need for Commission regulation in the first instance. Having failed to provide any empirical evidence to that effect, and in light of the substantial record to the contrary, the correct Commission decision is to leave inmate service rate issues to the marketplace.

⁶⁵ CURE Comments at 14.

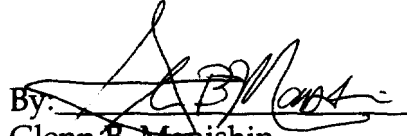
⁶⁶ Telecommunications Research & Action Center v. Central Corp., 4 FCC Rcd. 2157 (1989).

⁶⁷ See Investigation on the Commission’s Own Motion Into the Operations, Practices and Regulation of Coin and Coinless Customer-Owned Pay Telephone Stations, D. 90-06-018, I. 88-04-029 (CPUC June 11, 1990).

CONCLUSION

BPP should not be extended to the correctional institution market. Applying BPP would seriously impair a market that is functioning well, would impose substantial costs on prisons, jails and taxpayers, and would eliminate a vital funding source for legitimate inmate welfare services.

Respectfully submitted,

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September 9, 1994

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW
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RE: CC Docket No. 92-77
Billed Party Preference

Dear Secretary Caton:

I am writing to you in my capacity as Sheriff of Pope County, Arkansas, to state my strong opposition to the application of Billed Party Preference to calls originated from jails.

I have been Sheriff of Pope County, Arkansas, for the past four years and was Jail Administrator for Pope County for the preceding nine years. My career in law enforcement spans more than nineteen years. During this time, I have had the opportunity to observe the availability and quality of telecommunications services provided to jails by the local exchange carrier, GTE, and by entrepreneurial companies such as Gateway Technologies. The simple fact is that prior to the entry of third party providers like Gateway, the telecommunications services made available by GTE were inadequate, both in terms of the quantity of telephone stations provided and that ability of their services to meet the unique needs of jail facilities.

For example, before Gateway installed its system, the jail had only one GTE payphone for the fifty to sixty prisoners that it typically housed. Because there was only one payphone for inmates in all cellblocks, inmates had to be transported between cellblocks to make telephone calls. This process was not only exceptionally inconvenient and inefficient, but also raised significant and unnecessary security problems.

William F. Caton
continued
Page 2

At the present time, our jail facilities obtain advanced telecommunications equipment from Gateway at no charge. With the Gateway system, the jail has multiple telephone stations throughout the jail, eliminating entirely the security problems and inefficiencies associated with transporting inmates among cellblocks. Moreover, the sophisticated features of the Gateway system make it possible for jail personnel to limit the telephone numbers which can be dialed from any station, the duration of a call, and to remotely cutt off telephone service to a particular telephone station or to the entire jail facility where circumstances so justify. These capabilities significantly enhance overall jail security and efficiency.

The loss of Gateway's advanced telecommunications equipment would also:

Make it impossible for the sheriff and/or jail administrator to choose the inmate phone provider which best meets the particular needs of their institution.

Require the sheriff and/or jail administrator to hire the additional staff required to supervise inmates sharing fewer and less accessible telephone stations.

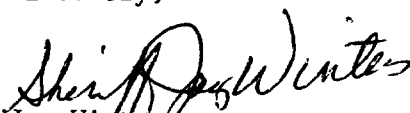
Make it impossible to control inmate calls, which could result in serious breaches in the security of our facilities as well as the reintroduction of harassing calls by inmates to victims, witnesses, and/or law enforcement and judicial personnel.

These problems are very serious and will significantly affect our ability to properly administer our jails and to protect the public at large from abuse of telecommunications services by inmates.

As I understand it, the imposition of Billed Party Preference will make it economically impossible for Gateway and similar companies to continue to provide telecommunications equipment to jails without charge. The result will either be that the County will have to spend scare resources to purchase the advanced equipment which we need (and currently have) or that we will return to the days of inadequate telecommunications systems which do not meet our unique needs. For these reasons, I do not believe that it would be in the public interest to apply Billed Party Preference to jails.

Thank you for taking the time to consider these comments. If you have any questions or if I can be of any assistance in the matter, please do not hesitate to contact me.

Sincerely,


Jay Winters
Pope County Sheriff

JW/sr



PRAIRIE COUNTY COURTHOUSE
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PRAIRIE COUNTY

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September 13, 1994

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Acting Secretary
Federal Communications Commission
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Washington, DC 20554

Re: CC Docket No. 92-77
Billed Party Preference

Dear Secretary Caton:

I am Sheriff of Prairie County, Arkansas. This letter is written to state my strong opposition to the application of Billed Party Preference to jails.

I have been Sheriff of Prairie County, Arkansas, for twelve years and have been in law enforcement for more than twenty-four years. I am personally familiar with the serious problems which existed when jails obtained their telecommunications equipment exclusively from the local exchange carrier, GTE. For example, before Gateway installed its system, the jail had only one GTE payphone for the twenty prisoners that it typically housed. When GTE removed this phone, claiming that it was not profitable, we were forced to allow inmates to use one of the jail's two emergency lines. This, of course, meant not only that the jail had to function much of the time with a single line, but that inmates were routinely in areas not designed for that purpose. Moreover, because inmates are allowed privacy while on the telephone, the public was subjected to significant fraud, particularly in calls fraudulently billed by inmates to a third number.

At the present time, our jail facilities obtain advanced telecommunications equipment from Gateway. With the Gateway system, the jail has multiple telephone stations throughout the jail, eliminating entirely the security problems and inefficiencies associated with transporting inmates to the telephone and guarding them while on the telephone. Moreover, the sophisticated features of the Gateway system make it possible for jail personnel to limit the telephone numbers which can be dialed from any station, the duration of a call, and to remotely cut off telephone service to a particular

William F. Caton
Acting Secretary
Federal Communications Commission
September 13, 1994

Exhibit A
page 4 of 4

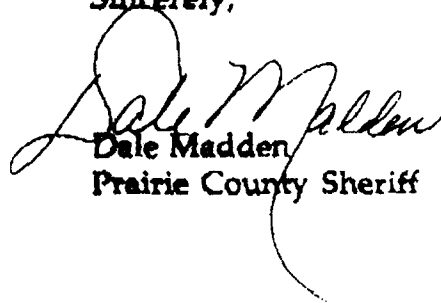
Page 2

telephone station or to the entire jail facility where circumstances justify. These capabilities significantly enhance overall jail security and efficiency.

I understand that the imposition of Billed Party Preference will make it economically impossible for companies like Gateway to provide telecommunications equipment to jails without charge. If this happens, we will likely see a prompt return to the inadequate telecommunications systems which do not meet our unique needs. For these reasons, I do not believe that it would be in the public interest to apply Billed Party Preference to jails.

I strongly urge you not to extend BPP to jails.

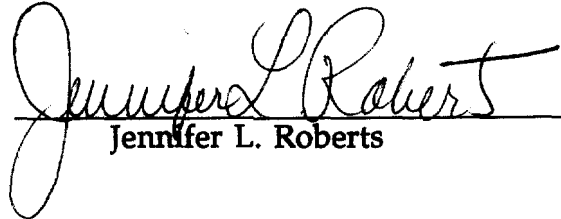
Sincerely,



Dale Madden
Prairie County Sheriff

CERTIFICATE OF SERVICE

I, Jennifer L. Roberts, do hereby certify on this 14th day of September, 1994, that I have served a copy of the foregoing document via first class mail, postage prepaid, to the following parties:


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